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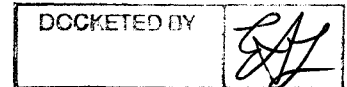
October 11, 2013

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ORIGINAL

CORP COMMISSION  
DOCKET CONTROL*Via UPS Overnight Delivery*Docket Control  
Arizona Corporation Commission  
1200 West Washington Street  
Phoenix, AZ 85007Arizona Corporation Commission  
DOCKETED

OCT 15 2013



RE: In the Matter of the Application of Dieca Communications dba Covad  
Communications Company, et al.  
Docket Nos. T-03632A-06-0091  
T-03406A-06-0091  
T-03267A-06-0091  
T-03432A-06-0091  
T-04302A-06-0091  
T-01051B-06-0091

Dear Docket Control:

Enclosed for filing are the original and 13 copies of the Comments of Eschelon Telecom of Arizona, Inc., Mountain Telecommunications, Inc., and Electric Lightwave, LLC, all doing business as Integra Telecom, provided as an update to Integra's October 4, 2013 comments, in connection with the above-referenced docket.

Sincerely,

Kim K. Wagner

Legal & Regulatory Administrator  
Integra Telecom

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Enclosures

cc: Parties of Record

1 **BEFORE THE ARIZONA CORPORATION COMMISSION**

2 BOB STUMP

Chairman

3 GARY PIERCE

Commissioner

4 BRENDA BURNS

Commissioner

5 BOB BURNS

Commissioner

6 SUSAN BITTER SMITH

Commissioner

7  
8 IN THE MATTER OF THE APPLICATION  
9 OF DIECA COMMUNICATIONS DBA  
10 COVAD COMMUNICATIONS COMPANY,  
11 ESCHELON TELECOM OF ARIZONA, INC.,  
12 MCLEODUSA TELECOMMUNICATIONS  
13 SERVICES, INC., MOUNTAIN  
14 TELECOMMUNICATIONS, INC., XO  
15 COMMUNICATIONS SERVICES, INC. AND  
16 QWEST CORPORATION REQUEST FOR  
COMMISSION PROCESS TO ADDRESS  
KEY UNE ISSUES ARISING FROM  
TRIENNIAL REVIEW REMAND ORDER,  
INCLUDING APPROVAL OF QWEST WIRE  
CENTER LISTS

Docket Nos. T-03632A-06-0091  
T-03406A-06-0091  
T-03267A-06-0091  
T-03432A-06-0091  
T-04302A-06-0091  
T-01051B-06-0091

COMMENTS OF ESCHELON  
TELECOM OF ARIZONA, INC.,  
MOUNTAIN  
TELECOMMUNICATIONS, INC.,  
AND ELECTRIC LIGHTWAVE,  
LLC, ALL DOING BUSINESS AS  
INTEGRA TELECOM

17 Eschelon Telecom of Arizona, Inc., Mountain Telecommunications, Inc., and Electric  
18 Lightwave, LLC, all doing business as Integra Telecom (collectively referred to as "Integra")  
19 respectfully provides this update to our October 4, 2013 comments responding to Qwest  
20 Corporation dba: CenturyLink QC's ("CenturyLink"), September 4, 2013 Application for  
21 Approval of 2013 Additions to the Non-Impaired Wire Center List.  
22

23 **Background**

24 On September 4, 2013 CenturyLink filed with the Commission an Application for  
25 Approval of 2013 Additions to the Non-Impair Wire Center List ("2013 Application"). In the  
26 2013 Application, CenturyLink requested that the Mesa Main (MESAAZMA), Superstition West  
27  
28

1 (SPRSAZWE), Tucson Main (TCSNAZMA) wire center classifications be changed from Tier 2  
2 to Tier 1 based on the number of fiber-based collocations in each central office. The impact and  
3 permanency of changes in wire center classifications lead Integra to undertake a careful review  
4 of the highly confidential data CenturyLink provided to Integra. Integra's October 4, 2013  
5 comments in this docket indicated that Integra was able to verify three of the four fiber-based  
6 collocators in Mesa Main, three of the four fiber-based collocators in Superstition West, and four  
7 of the five fiber-based collocators in Tucson Main, but we were unable to obtain a response  
8 verifying a fiber based collocation status from two carriers. Integra requested that it be allowed  
9 to update the record in one week to provide a status of its verification efforts with respect to the  
10 two remaining carriers.  
11

#### 12 **Discussion**

13  
14 Over the past week, Integra received a response from one of the two remaining carriers.  
15 This carrier's response verified it is the fourth of the four fiber-based collocators needed in Mesa  
16 Main to classify the wire center as Tier 1. Based on this carrier's response, Superstition West is  
17 the only wire center where Integra has been unable to verify the presence of four fiber-based  
18 collocations.  
19

20 Integra and CenturyLink are working with the remaining carrier to verify its fiber-based  
21 collocator status in the Superstition West wire center. We anticipate a response from this carrier  
22 shortly. Highly Confidential Exhibit A.2, attached to these comments, identifies the carrier that  
23 has not verified its status as a fiber-based collocator. In addition, CenturyLink contacted Integra  
24 and invited Integra to participate in an on-site inspection of the fiber based collocations in the  
25 Superstition West wire center, should the one carrier remain non-responsive.  
26

27 Integra will continue our efforts to verify the fiber based collocation status of the one  
28

1 remaining carrier. There are a number of verification options available. Integra is working with  
2 CenturyLink to pursue these options.

3 **Conclusion**

4  
5 Until final verification can be completed, Integra objects to CenturyLink's request to  
6 change the classification of the Superstition West (SPRSAZWE) wire center from Tier 2 to Tier  
7 1 on the ground that the record is insufficient to support CenturyLink's request. Integra  
8 withdraws its objections to Mesa Main (MESAAZMA) being classified as a Tier 1 wire center.  
9 Integra did not object to Tucson Main (TCSNAZMA) being classified as a Tier 1 wire center in  
10 its October 4, 2013 comments.

11  
12 Integra requests that it be given additional time to work with CenturyLink to finalize the  
13 verification of fiber based collocations in the Superstition West wire center. To the extent the  
14 remaining carrier confirms it is a fiber-based collocator or Integra visually verifies its status as a  
15 fiber collocator in the wire center, Integra would withdraw its objection to CenturyLink's request  
16 for reclassification of Superstition West (SPRSAZWE). In the event the remaining carrier  
17 claims it is not a fiber-based collocator in the wire center in question, Integra requests that the  
18 parties in this docket immediately meet to discuss the discrepancies and attempt to either find  
19 resolution to the discrepancy or set a schedule before the Commission to resolve the dispute.

20  
21 RESPECTFULLY submitted this 11th day of October, 2013.

22  
23 

24 Kim Isaacs, Director Carrier Relations  
25 Integra  
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The Original and 13copies of the foregoing were filed, via UPS overnight delivery, this 11th day of October, 2013 with:

Docket Control  
Arizona Corporation Commission  
1200 West Washington Street  
Phoenix, Arizona 85007

Copies of the foregoing were mailed this 11th day of October, 2013 to:

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11  
12  
13   
14 Kim Wagner  
Legal and Regulatory Administrator

15 \*\*Confidential/Highly Confidential Protective Order signed  
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## REDACTED Exhibit A.2

### Integra Fiber-Based Collocator Verification

Wire Center Name	Wire Center CLLI	CLEC Name	Verification Status
Mesa Main	REDACTED		
Superstition West	REDACTED		
Tucson Main	REDACTED		